	Page 90
1	
2	SUPREME COURT OF THE STATE OF NEW YORK
3	COUNTY OF KINGS
4	x
5	STALIN RODRIGO REYES ESPINOZA,
6	Plaintiff,
7	-against-
8	DAVS PARTNERS LLC AND KALNITECH
	CONSTRUCTION COMPANY,
9	
	Defendants.
10	
	x
11	
	Veritext Virtual
12	
	March 24, 2022
13	11:09 a.m.
14	
15	CONTINUED EXAMINATION BEFORE TRIAL of
16	STALIN RODRIGO REYES ESPINOZA, the
17	Plaintiff in the above-entitled action,
18	held at the above time and place, taken
19	before Carol Ellinghaus, a Notary Public
20	of the State of New York, pursuant to an
21	Order and stipulations between Counsel.
22	
23	
24	
25	

	Page 91
1	
2	APPEARANCES:
3	GORAYEB & ASSOCIATES, PC
	Attorneys for Plaintiff
4	100 William Street, Ste. 1900
	New York, New York 10039
5	
	BY: KENNETH KLEIN, ESQ.
6	
7	RICHMAN & LEVINE, PC
	Attorneys for Defendant
8	Davs Partners, LLC
	666 Old Country Road
9	Garden City, New York 11530
10	BY: KEITH RICHMAN, ESQ.
11	
	LAW OFFICE OF MICHAEL SWIMMER
12	Attorneys for Defendant
	Kalnitech Construction Company
13	605 3rd Avenue, 9th Floor
	New York, New York 10158
14	
	BY: ROBERT BRIGANTIC, ESQ.
15	
16	ALSO PRESENT: Alice Dow,
4	Spanish Interpreter
17	
10	* * *
18	
19	
20	
21	
22	
23 24	
25	

Page 102 1 S. Espinoza 2 Q. Was it the day before June 28 or something else? 3 It could have been during that 5 week but I don't remember exactly. On June 28, 2019, the day of the 6 7 accident on Friday, what time did you arrive at the building approximately? 8 9 At eight in the morning. Α. 10 Q. How did you get there? 11 They brought me in a van. Α. 12 At that time you were working Q. 13 for Jim Associates? 14 Α. Yes. 15 Were there other Jim Associates 16 employees or personnel on the job site on 17 the day of the accident, June 28? 18 Α. Yes. 19 Ο. Tell me their names. 20 Α. No, I cannot because I don't know everyone's name and I don't remember. 21 22 How many other people were there Q. 23 from Jim Associates in addition to 24 yourself? 25 Just give me a minute so I can Α.